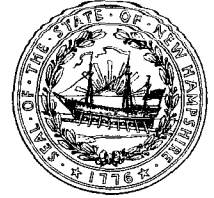




The State of New Hampshire  
**Department of Environmental Services**



Michael P. Nolin  
Commissioner

September 12, 2006

Dr. Arthur Hanson  
Superintendent  
SAU #16  
24 Front Street  
Exeter, New Hampshire 03833

**CERTIFIED MAIL (7005 1160 0004 7467 7496)**  
**RETURN-RECEIPT REQUESTED**  
**LETTER OF DEFICIENCY**  
**No. ARD 06-022**  
**(Sta.S)**

**RE: Swasey Central School, 355 Middle Road, Brentwood, New Hampshire**

Dear Dr. Hanson:

On June 29 and July 12, 2000, the New Hampshire Department of Environmental Services, Air Resources Division ("DES") conducted a compliance inspection at the Swasey Central School ("Swasey School") on 355 Middle Road in Brentwood, New Hampshire. The purpose of the inspection was to determine Swasey School's compliance status with the N.H. Administrative Rules Env-A 100 *et seq.*, NH Rules Governing the Control of Air Pollution.

On June 28, 2006, DES forwarded a letter to Mr. Richard Wendell, Director of Operations at SAU #16, requesting current information on the fuel burning devices at several schools, including the Swasey School. A copy of the letter and a copy of the signed certified mail postal receipt are enclosed. No response to that letter was received.

On August 28, 2006, DES contacted the Swasey School by telephone to obtain information regarding the fuel burning devices at the Swasey School. Mr. Mark Coellner verified that the Swasey School has four boilers with design ratings less than 10 million BTU's per hour of gross heat input, burning natural gas, which do not require permits to operate. The relevant rule for a fuel burning device using natural gas is Env-A 607.01(a). Mr. Coellner also explained that the Swasey School operates an emergency generator at the Swasey School.

As a result of the inspection, DES's letter of June 28, 2006, and the telephone call of August 28, 2006, this Letter of Deficiency ("LOD") is being sent to identify the following deficiencies:

1. RSA 125-C:11 and Env-A 603.01, *Permit Required*, require the owner or operator of a source of air pollutants to obtain a temporary permit prior to the construction or installation of a source or device, and a State permit to operate prior to operating the source or device, if that source or device is listed in Env-A 607.01, *Specific Applicability for Temporary Permits*. Env-A 607.01(d) requires a permit for an engine that combusts liquid fuel and which has a design rating greater than or equal to 1.5 million BTUs per hour of gross heat input. The Swasey School installed a 200-kilowatt emergency generator using diesel fuel oil with a design rating of 2.2 million BTUs per hour in October 2001. To date, the Swasey School has not applied for a permit to install or operate the emergency generator.
2. Env-A 907, *General Reporting Requirements*, requires the owner or operator of a source or device that requires a permit to submit an annual emission report each year by April 15. The Swasey School has not submitted annual emission reports for the emergency generator.
3. Env-A 705, *Emission-Based Fee*, requires the Swasey School to submit annual emission-based fees as calculated pursuant to Env-A 705.03. The Swasey School has not submitted emission-based fees for the emergency generator.

DES believes that the deficiencies can be resolved by the Swasey School taking the following actions:

- i. By **October 20, 2006**, submit to DES an application for a temporary permit for the 2.2 million BTU per hour emergency generator. The necessary application forms are enclosed.
- ii. By **October 20, 2006**, submit to DES emission reports for calendar years 2003 through 2005.
- iii. By **October 20, 2006**, calculate emission fees owed for calendar years 2003 through 2005 and submit to DES a schedule for paying those fees. The fees for calendar years 2003 emissions is \$85.37 per ton, 2004 emissions is \$86.75 per ton, and the fee for calendar year 2005 emissions is \$88.61 per ton.

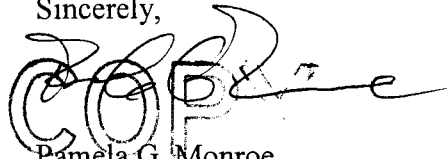
In the event compliance is not achieved within the time periods indicated, DES may initiate formal action against the Swasey School, including issuing an order requiring the deficiency to be corrected, and/or referring this matter to the NH Department of Justice.

Please address all information to Barbara Hoffman, at the following address:

NHDES Air Resources Division  
Enforcement Section  
29 Hazen Drive  
P.O. Box 95  
Concord, NH 03302-0095

If you have questions regarding compliance with Env-A 100 *et seq.* or require further information, please contact Barbara Hoffman at (603) 271-7874, Air Resources Division, Compliance Bureau. In addition, please contact Sonny Strickland at (603) 271-6283, if you need assistance in preparing the emission reports and calculating the fees. If you require assistance with the permit application, please contact Todd Moore at (603) 271-6798. A current copy of the Air Resources Division rules can be obtained from the DES website at <http://www.des.nh.gov/rules/air.htm> or by contacting the Public Information Center at (603) 271-2975.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Monroe', written over a large, stylized 'COPY' stamp.

Pamela G. Monroe  
Compliance Bureau Administrator  
Air Resources Division

PGM/asb

Enc.: GSP-1 Form, GSP-2 Form  
Letter Dated June 28, 2006

cc: R. Kurowski, EPA Region 1  
G. Hamel, DES Legal Unit Administrator  
Robert Gilbert, Chair, Board of Selectmen, Town of Brentwood  
Joan Ostrowski, Principal, Swasey Central School  
Richard Wendell, Director of Operations SAU #16  
AFS #3301590895